

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>IN RE: Anthony Roldan</b>	)	
<b>Marlene Roldan</b>	)	<b>Case No: 18 B 18593</b>
	)	<b>Judge: Barnes</b>
	)	<b>Chapter 13</b>
<b>Debtors</b>	)	

**NOTICE OF MOTION**

**Served upon the following parties electronically:**

**Office of United States Trustee**, Dirksen Federal Building, 219 S. Dearborn, St., Room 873, Chicago, IL 60604

**Trustee:** Marilyn Marshall, 224 South Michigan, Suite 800, Chicago, IL 60604

**and served upon the following parties via U.S. Mail:**

**Debtors:** Anthony Roldan and Marlene Roldan, 7130 S. Albany, Chicago, IL 60629

**Creditor:** Value Auto, 2734 N. Cicero, Chicago, IL 60639

**Additional Notice Address:** Edward Szymanski, Law office of Edward R. Szymanski, P.O. Box 5358, Elgin, IL 60121

**Registered Agent for Value Auto:** Sidney Morrison, 77 W. Washington St, Suite #1611, Chicago, IL 60639

PLEASE TAKE NOTICE that on May 9, 2019 at 9:30 a.m., or as soon thereafter as I may be heard, I shall appear before the Honorable Judge Barnes, or any other Bankruptcy Judge presiding in his place in Courtroom 744 of the Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn St., Chicago, Illinois, on the attached Objection to Proof of Claim 4 Filed by Value Auto, and shall request that the attached Order be entered, at which time you may appear if so desired.

**PROOF OF SERVICE**

I, The undersigned, an attorney, hereby certify that a copy of this notice was served electronically or mailed to the above persons, at her respective addresses, postage prepaid, by depositing in the U.S. Mail at 211 W. Wacker Dr., Chicago, IL 60606, before 6:00 p.m. on or before April 5, 2019.

/s/ Angelica Harb  
Angelica Harb  
Law Office of Jason Blust, LLC  
211 W. Wacker Dr., Ste. 300  
Chicago, IL 60606  
312-273-5001

Label Matrix for local noticing

0752-1

Case 18-18593

Northern District of Illinois

Eastern Division

Fri Apr 5 14:53:25 CDT 2019

Arnold Scott Harris

111 W. Jackson Blvd., Ste. 600

Chicago, IL 60604-3517

U.S. Bankruptcy Court

Eastern Division

219 S Dearborn

7th Floor

Chicago, IL 60604-1702

City of Chicago Department of Finance

c/o Arnold Scott Harris P.C.

111 W Jackson Blvd Ste.600

Chicago IL. 60604-3517

Aaron S Sales &amp; Lease

Attn: Bankruptcy

Po Box 100039

Kennesaw, GA 30156-9239

City of Chicago Parking

Dept of Revenue

PO Box 88292

Chicago, IL 60680-1292

GFC Lending, LLC

PO BOX 29018

PHOENIX, AZ 85038-9018

Go Financial

7300 E Hampton Ave

Mesa, AZ 85209-3324

I C System Inc

444 Highway 96 East

P.O. Box 64378

St. Paul, MN 55164-0378

Online Collections

Po Box 1489

Winterville, NC 28590-1489

Peoples Gas

Attn: Bankruptcy

200 E Randolph

Chicago, IL 60601-6302

Southwest Credit Systems

4120 International Parkway

Suite 1100

Carrollton, TX 75007-1958

Value Auto

2734 N Cicero

Chicago, IL 60639-1758

Anthony Roldan

7130 S. Albany

Chicago, IL 60629-3007

Jason Blust

Law Office of Jason Blust, LLC

211 W. Wacker Drive

Ste. 300

Chicago, IL 60606-1390

Marilyn O Marshall

224 South Michigan Ste 800

Chicago, IL 60604-2503

Marlene Roldan

7130 S. Albany

Chicago, IL 60629-3007

Patrick S Layng

Office of the U.S. Trustee, Region 11

219 S Dearborn St

Room 873

Chicago, IL 60604-2027

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)City of Chicago, an Illinois Municipal Cor

(u)GFC Lending, LLC

(du)GFC Lending, LLC

End of Label Matrix

Mailable recipients 17

Bypassed recipients 3

Total 20

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	)	<b>Chapter 13</b>
<b>Debtors</b>	)	

**OBJECTION TO PROOF OF CLAIM 4 FILED BY VALUE AUTO**

Now comes Anthony Roldan and Marlene Roldan (hereinafter referred to as “Debtors”), by and through their attorneys, and as their Objection to Proof of Claim 4 Filed by Value Auto, respectfully represents as follows:

1. On June 29, 2018, the Debtors filed a petition for relief under Chapter 13 of the Bankruptcy Code.
2. This Honorable Court confirmed the Debtors’ Chapter 13 Plan on August 16, 2018.
3. On November 13, 2018, Value Auto filed a Secured Proof of Claim in the amount of \$6,731.21 for a lien on a 2006 Hyundai Elantra. (see attached Proof of Claim, referred to as “Exhibit A”). The Debtors allege the 2006 Hyundai Elantra was impounded by the City of Chicago in April 2014.
4. The last date to file a proof of claim was September 7<sup>th</sup>, 2018. The proof of claim filed by Value Auto was on November 13<sup>th</sup>, 2018. The proof of claim was not filed timely.
5. Since the proof of claim was not filed timely, the claim should be disallowed.
6. The Debtors respectfully request that the Proof of Claim #4 by Value Auto is disallowed.

**WHEREFORE**, Debtors pray that this Honorable Court enter an Order for the following relief:

1. Disallowing claim number 4 by Value Auto in full; and
2. For such other relief as this Court deems proper under the circumstances.

Respectfully submitted,

          /s/ Angelica Harb  
Angelica Harb  
Law Office of Jason Blust, LLC  
211 W. Wacker Dr., Ste. 300  
Chicago, IL 60606  
312-273-5001